

EXHIBIT A

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

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March 16, 2024

Via Electronic Mail

Craig M. Reiser
Axinn, Veltrop & Harkrider LLP
114 West 47th Street
New York, NY 10036

Re: *In re Google Digital Advertising Antitrust Litig.*, No. 21-md-3010 (PKC) [rel:
Associated Newspapers, Ltd. v. Google LLC, No. 21-cv-3446 (PKC)]

Dear Mr. Reiser:

Associated Newspapers, Ltd. and Mail Media, Inc. (“Daily Mail”) are producing today materials bearing Bates numbers DM_GOOG_0176373 – DM_GOOG_0965177. We have provided a link to these materials under separate cover. The email to which this letter is attached provides a password.

These materials are responsive to Google LLC and Alphabet Inc.’s First Set of Requests for Production of Documents to Daily Mail (the “Requests”) in *Associated Newspapers, Ltd. v. Google LLC*, No. 21-cv-3446 (PKC). Daily Mail is not producing documents it determined to be relevant only to its claims regarding Google search that were dismissed by Judge Castel. MDL Doc. 701.

Daily Mail does not intend to produce any materials protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity, or protection from disclosure. Any such production is unintentional and should not be construed to constitute a waiver of such privilege and/or protection. Daily Mail reserves the right to require the return or destruction of any inadvertently disclosed documents or materials.

The materials in today’s production have been assigned confidentiality designations in accordance with the Modified Confidentiality Order, MDL Doc. 685. The production of these documents is without waiver of any of the objections or qualifications set forth in Daily Mail’s Responses and Objections to Google’s Requests.

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

Craig M. Reiser
March 16, 202
Page 2

Sincerely,

/s/ John Thorne

John Thorne